REMARKS

In the Official Action mailed April 4, 2002, claims 1-14 were rejected. By this response, claims 1-5 and 12-14 have been amended and new claims 20-25 have been added. Upon entry of the amendments, claims 1-14 and 20-25 will be pending in the present application. Reconsideration of the rejection and allowance of the pending claims are respectfully requested.

Rejection Under 35 U.S.C. § 112

In the Official Action, claims 3 and 4 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to point out and distinctly claim the subject matter which Applicants regard as the invention. Specifically, the Examiner rejected the use of the term "fluidicly." Claims 3-5 and 14 have been amended to replace the term "fluidicly" with the term "fluidally." These amendments to claims 3-5 and 14 do not narrow the scope of the claims.

Rejection Under 35 U.S.C. § 102(b)

In the Official Action, claims 1, 2, and 7-13 were rejected under 35 U.S.C. §102(b) as being anticipated by Ekstromer, U.S. Patent No. 1,960,484. Independent claims 1 and 12 have been amended to further clarify their recitations. Claims 1, 2, and 7-13 are not anticipated because the Ekstromer reference does not teach all of the recited features of the claims.

Some of the recited features of amended independent claim 1 that are not shown by the Ekstromer reference are "a plurality of motor sections, wherein the plurality of motor sections are mechanically and electrically coupleable to form a *single* motor of a desired length, each motor section including a modular rotor section and a modular stator section." The Ekstromer reference discloses a *plurality of motors* 17 that are assembled together to form a motive power driving unit 16. See Ekstromer, page 2, lines 45-48. Each of the motors 17 of the Ekstromer reference is a fractional horsepower polyphase induction motor. See Ekstromer, page 2, lines 45-48. The motive power driving unit 16 is not a *single* motor of a desired length. Rather, the motive power driving unit 16 is a plurality of individual complete motors that are coupled together to cooperate in driving the rotor shaft 28. Therefore, the Ekstromer reference does not teach all of the recited

features of amended claim 1 and does not anticipate claim 1. Claims 2 and 7-11 depend from independent claim 1, and are not anticipated by the Ekstromer reference for the reasons provided above, as well as by virtue of their own recited subject matter.

Furthermore, some of the recited features of amended independent claim 12 that are not shown by the Ekstromer reference are "a plurality of motor sections, wherein the plurality of motor sections are mechanically and electrically coupleable to form a motor of a desired length" and "a single end coil section coupleable to one of the plurality of modular motor sections to complete electrically a stator formed by the plurality of modular stator sections and the single end coil section." As discussed above, the Ekstromer reference discloses a plurality of individual motors 17 coupled together to form a drive unit 16. Each of the motors 17 of the Ekstromer reference has a primary or stator winding 23. See Ekstromer, page 2, lines 63-66. Because each of the motors 17 of the Ekstromer reference is a complete induction motor, each motor 17 has an end coil to couple the stator windings located on one side of the stator to the stator windings located on the other side of the stator. As discussed above, each of the items labeled in Fig. 2 and identified in the specification as a stator winding 23 is an end coil. Thus, the Ekstromer reference does not teach "a *single* end coil section coupleable to *one* of the plurality of modular motor sections to complete electrically a stator formed by the plurality of modular stator sections and the single end coil section." Therefore, claim 12 is not anticipated by the Ekstromer reference. Claim 13 depends from claim 12. Therefore, claim 13 also is not anticipated by the Ekstromer reference.

For all of these reasons, claims 1, 2 and 7-13 are not anticipated by the Ekstromer reference. Withdrawal of the rejection and allowance of claim 1, 2 and 7-13 are respectfully requested.

Rejection Under 35 U.S.C. § 103

Claims 3-5 and 14 were rejected under 35 U.S.C. §103(a) as being unpatentable over Ekstromer in view of Schob, U.S. Patent No. 5,939,813. Claims 3-5 and 14 are patentable because the cited references, either alone or in combination, do not teach, suggest, or disclose all

of the recited features of the claims. Claims 3-5 depend from independent claim 1 and claim 14 depends from independent claim 12. As discussed above, the Ekstromer reference does not teach all of the recited features of amended independent claims 1 and 12.

Some of the recited features of amended independent claim 1 that are not taught, suggested, or disclosed by the Ekstromer and Schob references, either alone or in combination, are "a plurality of motor sections, wherein the plurality of motor sections are mechanically and electrically coupleable to form a *single* motor of a desired length, each motor section including a modular rotor section and a modular stator section." As discussed above, the Ekstromer reference discloses a *plurality of motors* 17 that are assembled together. See Ekstromer, page 2, lines 45-48. The Ekstromer reference does not teach, suggest, or disclose "a plurality of motor sections that are mechanically and electrically coupleable to form a single motor." Furthermore, the Schob reference does not teach, disclose, or suggest these recited features. In addition, the combination of the Ekstromer and Schob references fails to teach, disclose, or suggest "a plurality of motor sections that are mechanically and electrically coupleable to form a single motor." Thus, the cited references do not teach, suggest, or disclose all of the recited features of amended independent claim 1. Therefore, independent claim 1 is nonobvious in view of the cited references. If an independent claim is nonobvious under 35 U.S.C. § 103, then any claim depending therefrom is nonobvious. *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988). Therefore, claims 2-5 are patentable by virtue of their dependence from independent claim 1. In addition, claims 3-5 are patentable by virtue of their own recited subject matter. For all of these reasons, claims 3-5 are patentable over the cited references.

In addition, some of the recited features of amended independent claim 12 that are not taught, suggested, or disclosed by the Ekstromer and Schob references, either alone or in combination, are "a single end coil section coupleable to one of the plurality of modular motor sections to complete electrically a stator formed by the plurality of modular stator sections and the single end coil section." Each of the motors 17 of the Ekstromer reference has a primary or stator winding 23. See Ekstromer, page 2, lines 63-66. Because each of the motors 17 of the Ekstromer reference is a complete induction motor, each motor 17 has an end coil to couple the

stator windings located on one side of the stator to the stator windings located on the other side of the stator. The Ekstromer reference does not teach, suggest, or disclose "a single end coil section coupleable to one of the plurality of modular motor sections to complete electrically a stator formed by the plurality of modular stator sections and the single end coil section." Furthermore, the Schob reference does not teach, suggest, or disclose "a single end coil section coupleable to one of the plurality of modular motor sections to complete electrically a stator formed by the plurality of modular stator sections and the single end coil section." In addition, the combination of the Ekstromer and Schob references fails to teach, disclose, or suggest "a single end coil section coupleable to one of the plurality of modular motor sections to complete electrically a stator formed by the plurality of modular stator sections and the single end coil section." Thus, the cited references do not teach, suggest, or disclose all of the recited features of amended independent claim 12. Therefore, claim 14 is patentable by virtue of its dependence from independent claim 12. In addition, claim 14 is patentable by virtue of its own recited subject matter. For all of these reasons, claim 14 is patentable over the cited references.

For all of these reasons, claims 3-5 and 14 are patentable over the Ekstromer and Schob references. Withdrawal of the rejection and allowance of claims 3-5 and 14 are respectfully requested.

New Claims

New claims 20-25 have been added by this amendment. New claims 20-25 do not add any additional subject matter and are fully supported by the specification. Claims 20-25 are believed patentable over the cited references.

Attachment

Attached hereto is a marked-up version of the changes made to the specification and claims by the current amendment. The attached page is entitled "VERSION WITH MARKINGS TO SHOW CHANGES MADE."

General Authorization for Extensions of Time

In accordance with 37 C.F.R. § 1.136, Applicants hereby provide a general authorization to treat this and any future reply requiring an extension of time as incorporating a request therefor. Furthermore, Applicants authorize the Commissioner to charge the appropriate fee for any extension of time to Deposit Account No. 06-1315: Order No. REDA:0094/VAN (89.0426).

Conclusion

In view of the above remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

Date: July 3, 2002

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VERSION WITH MARKINGS TO SHOW CHANGES MADE

Please amend claims 1-5 and 12-14 as follows:

1. (Amended) An electric motor, comprising:

a plurality of motor sections, wherein the plurality of motor sections are mechanically and electrically coupleable to form a single motor of a desired length, each motor section including a modular rotor section and a modular stator section.

2. (Amended) The electric motor as recited in claim 1, wherein the plurality of motor sections includes:

a first motor section having a first modular rotor section and a first modular stator section; and

a second motor section having a second modular rotor section coupleable to the first modular rotor section and a second modular stator section electrically coupleable to the first stator section to form a single continuous linear stator, wherein electricity flowing through the first and second modular stator sections produces a magnetic field to impart rotative motion in the rotor.

3. (Amended) The electric motor as recited in claim 1, wherein the plurality of motor sections are ~~fluidiely~~ coupleable fluidally to allow fluid to pass between the plurality of motor sections.

4. (Amended) The electric motor as recited in claim 2, wherein the first motor section and the second motor section are ~~fluidicly~~ coupleable fluidally to allow fluid to pass between the first and second motor sections.

5. (Amended) The electric motor as recited in claim 2, wherein the second motor section is ~~fluidicly~~ coupleable fluidally to an external device.

12. A submersible pumping system, comprising:

a submersible electric motor, ~~having~~comprising:

a plurality of motor sections, wherein the plurality of motor sections are mechanically and electrically coupleable to form a motor of a desired length, each motor section ~~including~~ comprising:

a modular rotor section coupleable to ~~a next~~ an adjacent modular rotor section of ~~a next~~ an adjacent motor section to form a rotor; and

a modular stator section coupleable to an adjacent modular stator section of the adjacent motor section; and

a single end coil section coupleable to one of the plurality of modular motor sections to complete electrically a stator formed by the plurality of modular stator sections and the single end coil section; and

a submersible pump drivingly coupled to the rotor of the submersible electric motor.

14. (Amended) The submersible electric motor as recited in claim 12, wherein the plurality of motor sections ~~includes~~comprises:

a first motor section having a first rotor section and a first stator section; and

a second motor section having a second rotor section coupleable to the first rotor section and a second stator section electrically coupleable to the first stator section, wherein electricity flowing through the first and second stator sections produces a magnetic field to impart rotative motion in the rotor.

14. (Amended) The system as recited in claim 12, further comprising a motor protector, wherein the plurality of motor sections are ~~fluidicly~~ fluidally coupleable to allow fluid to pass between the first motor section and the motor protector.

Please add the following new claims:

20. (New) The electric motor as recited in claim 2, comprising a single end coil section adapted to complete electrically the single stator formed by the first modular stator section and the second modular stator section.

21. (New) The electric motor as recited in claim 1, wherein each modular stator section comprises a first stator winding extending linearly through the modular stator section to form a continuous linear stator with a second stator winding extending linearly through an adjacent modular stator section.

22. (New) The electric motor as recited in claim 1, wherein the modular stator sections are coupled electrically in series

23. (New) An electric motor, comprising:

a plurality of motor sections, wherein the plurality of motor sections are mechanically and electrically coupleable to form a motor of a desired

length, each motor section including a modular rotor section and a modular stator section adapted to form a continuous linear stator.

24. (New) The electric motor as recited in claim 23, wherein the plurality of modular stator sections are adapted to form a single stator when electrically coupled in series.

25. (New) The electric motor as recited in claim 23, comprising a single end coil section adapted to complete electrically the modular stator sections.